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19 **UNITED STATES DISTRICT COURT**
20 **NORTHERN DISTRICT OF CALIFORNIA**
21 **SAN FRANCISCO DIVISION**

22 AMERICAN FEDERATION OF
23 GOVERNMENT EMPLOYEES, AFL-CIO, *et al.*,

24 Plaintiffs,

25 v.

26 DONALD J. TRUMP, in his official capacity as
27 President of the United States, *et al.*,

28 Defendants.

Case No.: 3:25-cv-03070-JD

**DECLARATION OF STANLEY
SNOW**

DECLARATION OF STANLEY SNOW

I, Stanley Snow, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am employed by the United States Department of Veterans Affairs (“VA”) and have 28 years of government service. For the last 14 years, I have worked at the VA Washington DC Healthcare System, Washington VA Medical Center (“Washington VAMC”) in the District of Columbia. I previously worked at the Boston VA Medical Center (“Boston VAMC”) in Boston, Massachusetts for 14 years.

3. I am the Local President of the American Federation of Government Employees, AFL-CIO (“AFGE”), Local 2798 (“AFGE Local 2798”). I have served as Local President since 2019. I previously served as Chief Shop Steward of AFGE Local 2143 at the Boston VAMC from 1997 to 2010.

4. AFGE Local 2798 represents bargaining unit employees at the Washington VAMC as well as VA clinics in Maryland, Virginia, and the District of Columbia, including the Charlotte Hall VA Clinic, Fort Belvoir VA Clinic, Franklin Street VA Clinic, Lexington Park VA Clinic, Montgomery County VA Clinic, Southeast Washington VA Clinic, and Southern Prince George’s County VA Clinic.

5. AFGE Local 2798 represents approximately 2,400 bargaining unit employees in dozens of occupations, including both professional and nonprofessional employees. Bargaining unit positions represented by AFGE Local 2798 include, but are not limited to, administrative assistants, practical nurses, nursing assistants, clinical dietitians, health technicians, inventory management specialists, medical support assistants, pharmacists, program analysts, healthcare engineers, physical therapists, physicians, dentists, police officers, security assistants, social workers, and psychologists.

6. Certain nonprofessional, Wage Grade employees (“Wage Grade employees”) of the Washington VAMC are represented by the Laborers International Union of North America, AFL-CIO (“LIUNA”), Local 572 (“LIUNA Local 572”). LIUNA Local 572 represents bargaining

1 unit positions such as housekeeping aides, laundry machine operators, laundry workers, air
2 conditioning equipment mechanics, air conditioning equipment operators, materials handlers (or
3 warehouse workers), electricians, plumbers, food service workers, and cooks.

4 7. Washington VAMC employees fall under the same organizational structure and
5 report to the same executive leadership team, consisting of an executive director, chief of staff,
6 and other senior executives, regardless of whether they are represented by LIUNA Local 572 or
7 AFGE Local 2798.

8 8. Washington VAMC employees are subject to the same training requirements,
9 security protocol, and building access restrictions. All-employee events, such as “town halls,” are
10 often convened to discuss changes in operations, leadership, and other working conditions. All
11 employees are invited and expected to attend these events, if able, regardless of whether they are
12 represented by LIUNA Local 572 or AFGE Local 2798.

13 9. The effective delivery of care at the Washington VAMC depends on mutual respect
14 and coordinated workflow across all roles and departments. Each position contributes to the care
15 and well-being of veterans, and teamwork is essential to ensure safe and efficient operations.

16 10. The Washington VAMC is an integrated health care system that relies heavily on
17 multi-disciplinary, cross-functional teams that provide direct and indirect care to veterans and their
18 families and caregivers. This requires constant, ongoing communication and coordination within
19 and between departments and service lines. Many of the Wage Grade employees represented by
20 LIUNA Local 572 work alongside employees represented by AFGE Local 2798 in the same team,
21 department, or service line, where they report to the same supervisors and collaborate to provide
22 care and services to veterans.

23 11. In Logistics and Supply Chain Management, materials handlers (or warehouse
24 workers) represented by LIUNA Local 572 perform physical labor in the warehouse area of the
25 Washington VAMC involving the loading, unloading, and handling of different types of
26 equipment and supplies necessary for the delivery of care and services. To that same end, the
27 inventory management specialists represented by AFGE Local 2798 are responsible for conducting
28 supply and inventory planning and overseeing the delivery of this same equipment and supplies.

1 Employees in Logistics and Supply Chain Management fall under the same supervisory structure
2 and work alongside one another to accomplish department objectives.

3 12. In the Environmental Management Service (EMS), housekeeping aides represented
4 by LIUNA Local 572 are responsible for maintaining safe and clean work areas and patient care
5 areas across the Washington VAMC. This involves, for example, cleaning wards, patient rooms,
6 storerooms, and offices. The various health care professionals and providers represented by AFGE
7 Local 2798, such as nursing assistants, physical therapists, health technicians, and social workers,
8 often submit work requests to EMS staff and coordinate with housekeeping aides to perform
9 cleaning and sanitation services, as needed.

10 13. In Dietary Services, food service workers and cooks represented by LIUNA Local
11 572 are responsible for preparing and delivering meals to veteran patients. The clinical dietitians
12 and nutrition professionals represented by AFGE Local 2798 develop meal plans consistent with
13 various dietary restrictions imposed by health care providers, and in turn, work in coordination with
14 food services workers and cooks to ensure that patients receive proper nourishment consistent with
15 their medical needs. These employees all work in close partnerships to perform their assignments.

16 14. In the Facilities Management Service (FMS), electricians and plumbers represented
17 by LIUNA Local 572 are responsible for installing, modifying, repairing, maintaining, and testing
18 various electrical lines, circuits, systems, water lines, boilers, coils, fans, and related equipment.
19 The program analysts represented by AFGE Local 2798 draft and submit work orders to initiate
20 repairs or equipment servicing depending on the needs of hospital departments and staff. These
21 program analysts work in close coordination with electricians and plumbers to ensure that tasks
22 are completed in a timely and satisfactory manner. Likewise, the healthcare engineers represented
23 by AFGE Local 2798 oversee project design and construction, manage safety inspections such as
24 water testing, and provide administrative services for various FMS initiatives. Electricians and
25 plumbers often perform the underlying work and address workplace hazards discovered during the
26 construction and design of projects overseen by healthcare engineers. All FMS staff work in close
27 coordination to accomplish department goals and objectives.

28 15. I am aware that Executive Order 14251, dated March 27, 2025 and titled

1 “Exclusions from Federal Labor-Management Relations Programs” (Exclusion Order), sought to
2 exclude employees of the U.S. Department of Veterans Affairs from coverage under the Federal
3 Service Labor-Management Relations Statute, 5 U.S.C. Chapter 71.

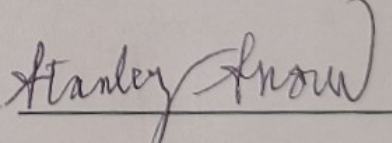
4 16. I am aware that in a notice published in the Federal Register, dated April 17, 2025,
5 and titled “Order Suspending the Application of Section 1-402 or 1-404 of Executive Order
6 12171,” Secretary Doug Collins suspended the application of the Exclusion Order to employees
7 represented by LIUNA Local 572 of the Washington VAMC.

8 17. AFGE bargaining unit employees of the Washington VAMC remain covered by the
9 Exclusion Order.

10 18. As a result, payroll deduction for voluntary union dues have stopped for AFGE
11 members of the Washington VAMC. However, payroll deduction for voluntary union dues
12 continues for members of LIUNA Local 572.

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14 I declare under penalty of perjury under the laws of the United States that the foregoing is
15 true and correct. Executed this 6th day of May 2025, in Washington, DC.

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Stanley Snow